

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA, :

Plaintiff, : **NOTICE OF MOTION**

- against - : **14 Cr. 810(CM)**

MOSHE MIRILISHVILI et al,
including

TASHEEN DAVIS,

Defendants. :

-----X

PLEASE TAKE NOTICE that defendant TASHEEN DAVIS, will, in accordance with the schedule previously set by the Court, move this Court on July 31, 2015 for the following relief:

I. Severance Pursuant to *Bruton v. United States*.

II. In accordance with Rule 404(b) of the Federal Rules of Evidence and the constitutional requirements espoused in *U.S. v. Baum*, 482 F.2d 1325 (2nd Cir. 1973); *U.S. v. Davidoff*, 845 F.2d 1151 (2nd Cir. 1988); *U.S. v. Brennan*, 798 F.2d 581 (2nd Cir. 1986), *Huddleston v. U. S.*, 485 U.S. 681 (1988); *U.S. v. Gilan*, 967 F.2d 772 (2nd Cir. 1992), for the purpose of asking the government to disclose to the defendant any and all acts which the government would seek to introduce against the defendant within two weeks of any scheduled trial date fixed by this court to facilitate the defendant reasonable time to may make a motion pursuant to Rules 403 and 404(b), to preclude introduction of such evidence.

III. Discovery and Brady Demands

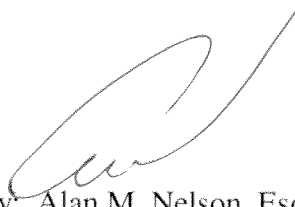
IV. For a Bill of Particulars pursuant to Fed. R. Crim. P. 7(f);

V. Joining all motions of co-codefendants' applicable herein.

VI. For such further relief as the Court deems fair and appropriate.

In support of this motion, TASHEEN DAVIS relies upon the annexed affirmation and Memorandum of Law of Alan M. Nelson, Esq., the Fourth and Fourteenth Amendments to the United States Constitution and Fed. R. Crim. P. 12(b)(3), 14 and 41(f) and 18 U.S.C. 2518 et sec.; the authority cited above, and the contents of the indictment.

Dated: Lake Success, New York
July 28, 2015



By: Alan M. Nelson, Esq. 3891AMN
Attorney for the Defendant
3000 Marcus Avenue, Suite 1E5
Lake Success, New York 11042
(516) 328-6200

To: Clerk of Court (ECF)
AUSA Edward Diskant (ECF)
All defense counsel (ECF)
Courtesy copy to Hon. Coleen McMahon (U.S. Mail)